

# FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 44



Florida OSS Test  
Third Amended Exception 44

January 23, 2001

## **EXCEPTION REPORT**

An exception has been identified as a result of the test activities associated with the Functional Carrier Bill Evaluation (TVV-11).

### **Exception:**

**BellSouth issued CABS bills that reflect incorrect quantities for Unbundled Switching and Transport usage. (TVV11)**

### **Background:**

In the course of executing the Functional Usage Evaluation (TVV11), KPMG Consulting completed a variety of test calls including calls on unbundled lines during the period December 11-14, 2000. KPMG Consulting examined the corresponding December and January CABS bills and observed inconsistencies between the expected and actual results. The expected results were calculated using the Daily Usage Feed (DUF) records sent by BellSouth-Florida.

### **Issue:**

Bellsouth rendered bills to the KPMG Consulting CLEC with incorrect quantities of Unbundled Transport Shared Transport Access Tandem Originating minutes. Inconsistencies were observed in each of the following rate categories:

1. Unbundled transport shared transport
2. Unbundled transport facilities termination end-office (EO) to end-office
3. Unbundled transport facilities termination EO to Tandem
4. Unbundled transport facilities termination TOPS to EO
5. Unbundled transport tandem switching
6. Unbundled local switching – switching functionality

### Category 1: Unbundled Transport Shared Transport

Inconsistencies in this category consisted of differences in the distribution of minutes across several mileage distances. Additionally, there were differences in the distances expected, based on KPMG Consulting calculations, and those actually reflected on the bills.

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## Categories 2 to 6

Inconsistencies in these categories consisted of differences in the expected number of minutes, as calculated by KPMG Consulting, and those reflected on the bill.

The following table provides examples of the discrepancies found in the different rate categories:

Q-Account/CLLI	561 Q85-5134 134 WPBHFLANDS0		904 Q85-5134 134 JCVLFLCLDS0		305 Q85-5134 134 MIAMFLOL68E	
	Expected	Actual	Expected	Actual	Expected	Actual
local originating	1116	38	42	35	298	214
tandem originating	192	92	167	16	84	23
access tandem originating	n/a	n/a	n/a	n/a	233	12
access tandem terminating	n/a	n/a	n/a	n/a	11	1
<b>Unbundled transport shared trans</b>	<b>1308</b>	<b>130</b>	<b>209</b>	<b>51</b>	<b>626</b>	<b>250</b>
local originating	1116	38	42	32	297	210
tandem originating	155	208	141	184	47	61
<b>Unbundled trans facilities term EO-EO</b>	<b>1271</b>	<b>246</b>	<b>183</b>	<b>216</b>	<b>344</b>	<b>271</b>
local tandem originating	17	16	10	10	6	15
access tandem originating	n/a	n/a	6	6	12	12
access tandem terminating	n/a	n/a	0	77	0	1
<b>Unbundled trans facilities term EO-Tandem</b>	<b>17</b>	<b>16</b>	<b>16</b>	<b>93</b>	<b>18</b>	<b>28</b>
local tandem originating	24	42	18	58	32	29
<b>Unbundled trans facilities term TOPS-EO</b>	<b>24</b>	<b>42</b>	<b>18</b>	<b>58</b>	<b>32</b>	<b>29</b>
local originating	1116	38	42	32	297	210
tandem originating	201	224	167	194	84	76
access tandem originating	n/a	n/a	6	6	12	12
access tandem terminating	n/a	n/a	0	77	0	1
<b>Unbundled trans tandem switching</b>	<b>1317</b>	<b>262</b>	<b>215</b>	<b>309</b>	<b>393</b>	<b>299</b>
local originating intraswitch	3724	3708	3202	3138	3627	3619
local originating interswitch	244	262	166	230	79	285
TEO interswitch	1206	288	163	274	379	201
access originating interswitch	175	180	202	524	233	234
terminating interswitch	3	90	0	149	11	82
<b>Unbundled local switching</b>	<b>5352</b>	<b>4528</b>	<b>3569</b>	<b>4316</b>	<b>4329</b>	<b>4521</b>

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## **Amendment:**

Bellsouth's response to Exception 44 identified the following four scenarios that contributed to the differences between the expected and actual number of minutes of use cited above:

1. Custom Local Area Signaling Services, such as Touch Star services, are not billable records for UNE usage rate elements as defined by BellSouth. However, DUF records are sent to the CLEC for their billing purposes.
2. Intralata toll calls LPIC'd to BellSouth were originally considered un-billable. A mechanical billing method for applying UNE usage to BellSouth carried Intralata toll messages will be implemented May 25, 2001. DUF records are sent to the CLEC for their billing purposes, however.
3. Usage sensitive calls, such as 3-way calling, are not billable records for UNE usage rate elements as defined by BellSouth. However, DUF records are sent to the CLEC for their billing purposes.
4. Alternately billed non-UNE originated or terminated calls, such as third number and credit card calls, are not billable records for UNE usage rate elements as defined by BellSouth. However, DUF records are sent to the CLEC for their billing purposes.

KPMG Consulting conducted a DUF retest between May 29<sup>th</sup> and June 1<sup>st</sup>, 2001. Inconsistencies were observed in each of the following rate categories:

1. Unbundled transport shared transport
2. Unbundled transport facilities termination end-office (EO) to end-office
3. Unbundled transport facilities termination EO to Tandem
4. Unbundled transport facilities termination TOPS to EO
5. Unbundled transport tandem switching – FL to EC
6. Unbundled transport tandem switching – Trunk Port
7. Unbundled local switching – switching functionality
8. Unbundled local switching – Trunk Port

## Category 1

Inconsistencies were observed in the mileages reported, as well as the distribution of minutes across several mileage distances. A summary of the differences is provided in the table below: (The detail is included as Attachment A).

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		Mileage Bands	
		Expected	Actual
<b>305 Q85-5134 134 MIAMFLOL68E</b>	Local	5, 11, 17, 51, 56, 58	10
	Tandem	11	--
<b>305 Q59-0568 568 MIAMFLOL68E</b>	Local	5, 9, 17, 51, 56	56
	Tandem	--	5, 10
<b>305 Q97-2336 336 MIAMFLOL68E</b>	Local	5, 9, 10, 11, 14, 51, 56, 58	--
	Tandem	5, 9, 10, 11, 14, 58	--
<b>904 Q85-5134 134 PNSCFLBLDS0</b>	Local	4, 37, 44	7
	Tandem	4, 7, 21	4, 7, 21

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## Categories 2 to 8

Rate Category	Q-Account/CLLI 561 Q59-0568 568 WPBHFLANDSO				561 Q85-5134 134 WPBHFLANDSO			
	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	39	50	11	28.21%	117	58	-59	-50.43%
Unbundled trans facilities term EO-EO	49	50	1	2.04%	76	81	5	6.58%
Unbundled trans facilities term EO-Tandem	9	10	1	11.11%	12	15	3	25.00%
Unbundled trans facilities term TOPS-EO	5	9	4	80.00%	23	17	-6	-26.09%
Unbundled trans tandem switch. FL-EC	62	60	-2	-3.23%	110	96	-14	-12.73%
Unbundled trans. tan. switch. Trunk Port	124	118	-6	-4.84%	220	193	-27	-12.27%
Unbundled local switching - Switch. Func	199	209	10	5.03%	351	315	-36	-10.26%
Unbundled local switching - Trunk Port	94	118	24	25.53%	124	194	70	56.45%

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Rate Category	Q-Account/CLLI 561 Q85-5134 134 FTLDFLMRDSO				305 Q59-0568 568 MIAMFLOL68E			
	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	31	31	0	0.00%	42	22	-20	-47.62%
Unbundled trans facilities term EO-EO	25	58	33	132.00%	27	26	-1	-3.70%
Unbundled trans facilities term EO-Tandem	5	4	-1	-20.00%	5	7	2	40.00%
Unbundled trans facilities term TOPS-EO	6	6	0	0.00%	9	6	-3	-33.33%
Unbundled trans tandem switch. FL-EC	36	61	25	69.44%	40	34	-6	-15.00%
Unbundled trans. tan. switch. Trunk Port	69	124	55	79.71%	75	68	-7	-9.33%
Unbundled local switching - Switch. Func	156	211	55	35.26%	181	173	-8	-4.42%
Unbundled local switching - Trunk Port	65	124	59	90.77%	35	66	31	88.57%

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Rate Category	305 Q85-5134 134 MIAMFLOL68E				305 Q97-2336 336 MIAMFLOL68E			
	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	625	2	-623	-99.68%	131	0	-131	-100.00%
Unbundled trans facilities term EO-EO	102	2	-100	-98.04%	79	0	-79	-100.00%
Unbundled trans facilities term EO-Tandem	505	0	-505	-100.00%	11	0	-11	-100.00%
Unbundled trans facilities term TOPS-EO	13	0	-13	-100.00%	28	0	-28	-100.00%
Unbundled trans tandem switch. FL-EC	102	2	-100	-98.04%	175	57	-118	-67.43%
Unbundled trans. tan. switch. Trunk Port	204	4	-200	-98.04%	250	122	-128	-51.20%
Unbundled local switching - Switch. Func	764	58	-706	-92.41%	724	588	-136	-18.78%
Unbundled local switching - Trunk Port	39	4	-35	-89.74%	247	121	-126	-51.01%

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Rate Category	Q-Account/CLLI 904 Q85-5134 134 P NSCFLBLDS0				904 Q85-5134 134 ORLDFLSADSO			
	Expected	Actual	Difference	%Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	56	78	22	39.29%	36	0	-36	-100.00%
Unbundled trans facilities term EO-EO	98	100	2	2.04%	0	0	0	0.00%
Unbundled trans facilities term EO-Tandem	25	22	-3	-12.00%	36	0	-36	100.00%
Unbundled trans facilities term TOPS-EO	0	0	0	0.00%	0	0	0	0.00%
Unbundled trans tandem switch. FL-EC	127	121	-6	-4.72%	36	0	-36	-100.00%
Unbundled trans. tan. switch. Trunk Port	220	221	1	0.45%	72	0	-72	-100.00%
Unbundled local switching - Switch. Func	434	500	66	15.21%	39	39	0	0.00%
Unbundled local switching - Trunk Port	98	220	122	124.49%	39	0	-39	-100.00%



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## Second Amendment

Following discussions between KPMG Consulting and BellSouth CABS billing Subject Matter Experts (SMEs), BellSouth provided new information with regard to how to calculate usage billing. The new information is shown below:

- 1 LRN is used to calculate mileages based on module 17B on the DUF record.
- 2 Directory assistance call completion events generate three DUF records, the directory assistance (DA) record, the DA call completion (DACC) record, and the record for the actual local or toll call resulting from the call completion: the DA and DACC portions are billed per event; the rate elements from the DACC call flow are only applicable to the local/toll record.
- 3 On alternately-billed calls, the billing account placement and rating is based on the originating telephone number – not the billed-to telephone number.

KPMG Consulting has recalculated expected mileage bands and expected billing by CLLI code based on the new information provided by BellSouth.

The results are presented below:

### Category 1 – Mileage Band Summary

		<b>Transport Mileage Band Breakdown</b>	
		<b>Expected</b>	<b>Actual</b>
<b>561 Q59-0568 568</b>	Local	5, 7, 8, 10, 37, 38, 40, 41	5, 7, 8, 10, 11, 37, 40
<b>WPBHFLANDS0</b>	Tandem	0, 5, 11, 13, 41	5, 10, 11, 13
<b>305 Q85-5134 134 MIAMFLOL68E</b>	Local	10, 17, 51, 56, #NA	10
	Tandem	0, 5, 10, 10, 21, 58, #NA	None
<b>305 Q59-0568 568 MIAMFLOL68E</b>	Local	5, 56	56
	Tandem	0, 5, 10, #NA	5, 5, 5, 5, 10
<b>904 Q85-5134 134 ORLDFLSADS0</b>	Local	--	--
	Tandem	--	--
<b>305 Q97-2336 336 MIAMFLOL68E</b>	Local	5, 10, 11, 51, 56, 58	--
	Tandem	0, 5, 5, 9, 10, 11, 14, #NA	--
<b>561 Q85-5134 134 WPBHFLANDS0</b>	Local	5, 8, 10, 11, 13, 37, 38, 40, 58	5, 8, 10, 11, 13, 37, 40
	Tandem	0, 5, 8, 11, 13, 52, #NA	5, 8, 10, 11, 13, 41
<b>561 Q85-5134 134 FTLDFLMRDS0</b>	Local	4, 5, 24, 27, 30	4, 5, 24, 27, 27
	Tandem	0, 5, 12, 17	5, 12, 13, 17
<b>904 Q85-5134 134 PNSCFLBLDS0</b>	Local	0, 0, 7, 7, 37, 44	7, 7
	Tandem	00, 4, 7, 21, #NA, #NA	4, 4, 4, 7, 21

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## Categories 2 to 8 – Rate element quantities by CLLI code

Q-Account/CLLI	561 Q59-0568 568 WPBHFLANDS0				561 Q85-5134 134 WPBHFLANDSO			
Rate Category	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	38	50	12	31.58 %	97	58	-39	-40.21%
Unbundled trans facilities term EO-EO	31	50	19	61.29%	68	81	13	19.12%
Unbundled trans facilities term EO-Tandem	7	10	3	42.86%	9	15	6	66.67%
Unbundled trans facilities term TOPS-EO	4	9	5	125.00%	13	17	4	30.77%
Unbundled trans tandem switch. FL-EC	41	60	19	46.34%	89	96	7	7.87%
Unbundled trans. tan. switch. Trunk Port	76	118	42	55.26%	169	193	24	14.20%
Unbundled local switching - Switch. Func	156	209	53	33.97%	295	315	20	6.78%
Unbundled local switching - Trunk Port	74	118	44	59.46%	169	194	25	14.79%

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Rate Category	561 Q85-5134 134 FTLDFLMRDSO				305 Q59-0568 568 MIAMFLOL68E			
	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	63	31	32	50.79%	40	22	-18	-45%
Unbundled trans facilities term EO-EO	53	58	5	9.43%	27	26	-1	-3.70%
Unbundled trans facilities term EO-Tandem	5	4	-1	-20.00%	4	7	3	75%
Unbundled trans facilities term TOPS-EO	6	6	0	0.00%	6	6	0	0.00%
Unbundled trans tandem switch. FL-EC	58	61	3	5.17%	37	34	-3	-8.11%
Unbundled trans. tan. switch. Trunk Port	113	124	11	9.73%	70	68	-2	-2.86%
Unbundled local switching - Switch. Func	204	211	7	3.43%	169	173	4	2.37%
Unbundled local switching - Trunk Port	113	124	11	9.73%	69	66	-3	-4.35%

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Rate Category	Q-Account/CLLI	305 Q85-5134 134 MIAMFLOL68E				305 Q97-2336 336 MIAMFLOL68E			
		Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans		114	2	-112	-98.25%	116	0	-116	-100.00%
Unbundled trans facilities term EO-EO		96	2	-94	-97.92%	88	0	-88	-100.00%
Unbundled trans facilities term EO-Tandem		4	0	-4	-100.00%	8	0	-8	-100.00%
Unbundled trans facilities term TOPS-EO		9	0	-9	-100.00%	22	0	-22	-100.00%
Unbundled trans tandem switch. FL-EC		109	2	-107	-98.17%	116	57	-59	-50.86
Unbundled trans. tan. switch. Trunk Port		214	4	-210	-98.13%	225	122	-103	-45.78%
Unbundled local switching - Switch. Func		746	58	-688	-92.23%	693	588	-105	-15.15%
Unbundled local switching - Trunk Port		212	4	-208	-98.11%	225	121	-104	-46.22%

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Rate Category	Q-Account/CLLI 904 Q85-5134 134 P NSCFLBLDS0				904 Q85-5134 134 ORLDFLSADSO			
	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	140	78	-62	-44.29	36	0	-36	-100.00%
Unbundled trans facilities term EO-EO	115	100	-15	-13.04%	0	0	0	0.00%
Unbundled trans facilities term EO-Tandem	21	22	1	4.76%	36	0	-36	100.00%
Unbundled trans facilities term TOPS-EO	0	0	0	0.00%	0	0	0	0.00%
Unbundled trans tandem switch. FL-EC	123	121	-2	-1.63%	36	0	-36	-100.00%
Unbundled trans. tan. switch. Trunk Port	226	221	-5	-2.21%	72	0	-72	-100.00%
Unbundled local switching - Switch. Func	526	500	-26	-4.94%	39	39	0	0.00%
Unbundled local switching - Trunk Port	250	220	-30	-12.00%	75	0	-75	-100.00%

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## **Impact:**

A CLEC's ability to accurately project revenue and operating expenses is based, in part, on accurate billings from the ILEC. Incorrect billing can distort financial planning. In addition, incorrect charges on CLEC bills may cause a CLEC to incur added costs to reconcile bills and pursue bill corrections.

KPMG Consulting has further concluded that many of the discrepancies between the expected and actual results are due to the inadequacy of existing UNE-P usage billing documentation and the absence of specific documentation for DUF-to-billing reconciliation. Some examples of information that is not documented are as follows:

- Local routing number (LRN) is used to compute mileage on certain calls based on module 17B on category 10 records.
- Rate elements for directory assistance call completion events are only billed based on the local/toll call record using call flows in the Dx series, and not the typical call flows for local/toll calls: 1, 2, 3, 4, 5, 7. The directory assistance and call completion records are billed per-occurrence ("hit") and the individual rate elements do not apply.
- BellSouth has stated that not as many rate elements are billed for customer service calls as are currently documented.
- On alternately-billed calls the bill-to number does not drive the billing account (Q-Account). It is determined by the from-number. Records that are billed to a UNE-P line but neither originate nor terminate on a UNE-P number will not appear on a CABS bill. If a call originates or terminates (in the case of access calls) on a UNE-P line but bills to resale the call will show up on the CABS bill.
- When a credit is issued, the original call is billed as usual but the credit is not.

## **Third Amendment**

Following discussions between KPMG Consulting and BellSouth CABS billing Subject Matter Experts (SMEs), the following issues were discovered:

1. Several terminating telephone numbers belonged to facility-based CLECs rather than BellSouth. For approximately four DUF records, KPMG Consulting needed to determine owning entity prior to calculating expected results.
2. Four DUF records contained an incorrect Method of Recording, contributing to inaccuracies in the calculation of expected results. BellSouth has put in a work request for this issue.

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3. Fifteen DUF records errored in BellSouth's systems. Delayed and "errored" billing are not normally visible to CLECs. BellSouth has no way to alert a CLEC that billing will be delayed. However, BellSouth can provide errored calls to a CLEC to assist in bill reconciliation.
4. The document entitled "J Bill Usage Section – Mapped to the Call Flows" requires qualifying language for rate category "Unbundled Transport Shared Transport – Tandem Originating" with regard to Directory Assistance calls.
5. BellSouth's document entitled "J Bill Usage Section – Mapped to the Call Flows" contains inaccuracies and/or typographical errors in the following rate categories:
  - Unbundled Transport Shared Transport – Tandem Originating
  - Unbundled Transport Facilities Termination EO to Tandem – Local Tandem Originating
  - Unbundled Transport Tandem Switching – Tandem Originating
  - Unbundled Transport Tandem Switching Trunk Port – Tandem Originating (EO and TEO)
  - Unbundled Local Switching, Switching Functionality – TEO Single Network Interswitch
  - Unbundled Local Switching Trunk Port – Local Originating EO and TEO Single Network Interswitch.
6. KPMG Consulting had assigned the incorrect call flow to fifteen DUF records.
7. KPMG Consulting had assigned six DUF records to incorrect bills.
8. KPMG Consulting needed to revisit Directory Assistance Call Completion call flow assignments. BellSouth provided revisions to the billing rules differing from those provided during calculations for Amendment Two above—the completion record applies to certain of the rate elements, while the remainder of rate elements apply to the directory assistance portion of the call. This change resulted in the inclusion of twenty-seven records which had previously been discounted in the calculation.
9. BellSouth's systems routed one call onto the wrong bill. (This is being investigated).
10. KPMG Consulting is to retain the TOPS-CLLI page of bills to assist in the reconciliation of the Unbundled Transport Shared Transport rate category for operator-handled traffic.

The above issues are all in addition to previous issues discussed during previous face-to-face meetings, and addressed in the First and Second Amendments above. KPMG Consulting has recalculated expected mileage bands and expected billing by CLLI code based on the new information provided by BellSouth.

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The results are presented below:

## Category 1 – Mileage Band Summary

		Transport Mileage Band Breakdown	
		Expected	Actual
<b>561 Q59-0568 568</b>	Local	5, 7, 8, 10, 11, 37, 40	5, 7, 8, 10, 11, 37, 40
<b>WPBHFLANDS0</b>	Tandem	5, 11, 13, #NA	5, 10, 11, 13
<b>305 Q85-5134 134</b>	Local	17, 56	17, 56
<b>MIAMFLOL68E</b>	Tandem	5, 21, 58, #NA	5, 5, 21, 58
<b>305 Q59-0568 568</b>	Local	5, 56	56
<b>MIAMFLOL68E</b>	Tandem	5, 1, 5, 5, #NA	5, 5, 5, 5, 10
<b>904 Q85-5134 134</b>	Local	--	--
<b>ORLDFLSADS0</b>	Tandem	--	--
<b>305 Q97-2336 336</b>	Local	5, 10, 11, 51, 56	5, 10, 10, 51, 56
<b>MIAMFLOL68E</b>	Tandem	5, 5	5, 5, 5, 9
<b>561 Q85-5134 134</b>	Local	5, 8, 10, 11, 13, 37, 38, 40, 58	5, 8, 10, 11, 13, 37, 40
<b>WPBHFLANDS0</b>	Tandem	0, 5, 8, 11, 13, 52, #NA	5, 8, 10, 11, 13, 41
<b>561 Q85-5134 134</b>	Local	4, 5, 24, 27, 27	4, 5, 24, 27, 27
<b>FTLDFLMRDS0</b>	Tandem	5, 12, 17, #NA	5, 12, 13, 17
<b>904 Q85-5134 134</b>	Local	7, 7	7, 7
<b>PNSCFLBLDS0</b>	Tandem	4, 7, 21, #NA	4, 4, 4, 7, 21

Note that the number of minutes calculated in this iteration by KPMG Consulting for mileage band “#NA” above corresponded to the number of minutes routed through TOPS switches as calculated by BellSouth. KPMG Consulting and other CLECs will not be able to calculate these distances; the V & H coordinates for specific TOPS switches are not publicly available.





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## Categories 2 to 8 – Rate element quantities by CLLI code

Q-Account/CLLI	561 Q59-0568 568 WPBHFLANDS0				561 Q85-5134 134 WPBHFLANDSO			
Rate Category	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	50	50	0	0	58	58	0	0%
Unbundled trans facilities term EO-EO	50	50	0	0%	81	81	0	0%
Unbundled trans facilities term EO-Tandem	10	10	0	0%	15	15	0	0%
Unbundled trans facilities term TOPS-EO	9	9	0	0%	17	17	0	0%
Unbundled trans tandem switch. FL-EC	60	60	0	0%	99	99	0	0%
Unbundled trans. tan. switch. Trunk Port	118	118	0	0%	193	193	0	0%
Unbundled local switching - Switch. Func	208	209	1	0.48%	315	315	0	0%
Unbundled local switching - Trunk Port	118	118	0	0%	194	194	0	0%

# FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 44

Rate Category	561 Q85-5134 134 FTLDFLMRDSO				305 Q59-0568 568 MIAMFLOL68E			
	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	31	31	0	0%	20	22	2	10%
Unbundled trans facilities term EO-EO	58	58	0	0%	27	26	-1	-3.70%
Unbundled trans facilities term EO-Tandem	4	4	0	0%	6	7	1	16.67%
Unbundled trans facilities term TOPS-EO	6	6	0	0%	6	6	0	0%
Unbundled trans tandem switch. FL-EC	61	61	0	0%	33	32	1	3.03%
Unbundled trans. tan. switch. Trunk Port	124	124	0	0%	66	64	2	3.03%
Unbundled local switching - Switch. Func	205	211	6	2.93%	161	163	2	1.24%
Unbundled local switching - Trunk Port	124	124	0	0%	65	66	1	1.54%

# FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 44

Q-Account/CLLI	305 Q85-5134 134 MIAMFLOL68E		305 Q97-2336 336 MIAMFLOL68E					
Rate Category	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	96	94	2	2.08%	26	45	19	73.08%
Unbundled trans facilities term EO-EO	99	96	3	3.03%	43	42	1	2.33%
Unbundled trans facilities term EO-Tandem	6	6	0	0%	14	15	1	7.14%
Unbundled trans facilities term TOPS-EO	11	13	2	18.18%	22	22	0	0%
Unbundled trans tandem switch. FL-EC	104	101	3	2.88%	56	55	1	1.79%
Unbundled trans. tan. switch. Trunk Port	214	212	2	0.93%	120	118	2	1.67%
Unbundled local switching - Switch. Func	742	745	3	0.40%	583	583	0	0%
Unbundled local switching - Trunk Port	212	210	2	0.94%	120	121	1	0.83%

# FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 44

Rate Category	Q-Account/CLLI 904 Q85-5134 134 PNSCFLBLDS0				904 Q85-5134 134 ORLDFLSADSO			
	Expected	Actual	Difference	% Diff	Expected	Actual	Difference	% Diff
Unbundled transport shared trans	79	78	1	1.27%	0	0	0	0%
Unbundled trans facilities term EO-EO	114	100	14	12.28%	0	0	0	0%
Unbundled trans facilities term EO-Tandem	21	22	1	4.76%	0	0	0	0%
Unbundled trans facilities term TOPS-EO	0	0	0	0.00%	0	0	0	0%
Unbundled trans tandem switch. FL-EC	121	121	0	0%	0	0	0	0%
Unbundled trans. tan. switch. Trunk Port	222	221	1	0.45%	0	0	0	0%
Unbundled local switching – Switch. Func	512	500	12	2.34%	39	39	0	0%
Unbundled local switching - Trunk Port	248	220	28	11.29%	0	0	0	0%

## **FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO 3<sup>RD</sup> AMENDED EXCEPTION 44**

### **Impact:**

A CLEC's ability to accurately project revenue and operating expenses is based, in part, on accurate billings from the ILEC. Incorrect billing can distort financial planning. In addition, incorrect charges on CLEC bills may cause a CLEC to incur added costs to reconcile bills and pursue bill corrections.

KPMG Consulting has further concluded that the iterative nature of the resolution of the discrepancies between the expected and actual results are due to the inadequacy of existing UNE-P usage billing documentation and the absence of specific documentation for DUF-to-billing reconciliation.

### **BellSouth Response:**

Issue 2: BellSouth will implement a program change to populate Method of Recording indicators to facilitate DUF mapping to the UNE bill for the four records in issue 2. BellSouth will notify KPMG when an implementation date is set for this change.

Issues 4 and 5: BellSouth will update documentation in the "J Bill Usage Section – Mapped to the Call Flows" for the language described in issues 4 and 5. In addition, BellSouth will update the CLEC documentation "How to Understand Your Bill" with a "UNE DUF to Call Flows Mapping" matrix. These documentation updates will be completed by January 15, 2002.

Issue 9: BellSouth will implement a program change to correct the billing for the UNE to UNE intraLATA call in question. BellSouth will notify KPMG when an implementation date is set for this change.

### **BellSouth Amended Response:**

Issue 2: BellSouth will implement the program change to populate the Method of Recording indicators to facilitate DUF mapping on February 5, 2002.

Issue 9: BellSouth will implement the program change to correct the billing for the UNE to UNE intraLATA call on February 22, 2002.